REMARKS

Claims 1-3, 7, 16, 17, 19-23, and 33-36 are pending. Claims 1 and 16 have been amended, and new claims 33-36 have been added. In view of the following remarks, all pending claims are believed to be allowable.

I. REJECTION OF CLAIM 1 UNDER 35 U.S.C. § 102(b).

Previously presented claim 1 was rejected under §102(b) as being anticipated by U.S. Pat. No. 6,545,358 (Jeong). Withdrawal of this rejection is requested for at least the following reasons.

i. Jeong does not teach an "uppermost layer that comprises metal regions disposed between dielectric regions", as recited in amended claim 1.

As amended, claim 1 requires that the uppermost layer "comprises metal regions disposed between dielectric regions". In Jeong, the alleged uppermost layer 23 comprises metal and does not include dielectric regions.

Further, Jeong does not teach "tungsten plugs that connect to one of the metal regions in the uppermost layer." Rather, Jeong's figures and description illustrate and describe only a tungsten plug 41 (*singular*) in the insulating layer 27 that connects to first plug 51. Therefore, Jeong does not teach tungsten plugs (*plural*) that connect to one of the metal regions. Accordingly, allowance of amended claim 1 is respectfully requested.

II. REJECTION OF CLAIM 16 UNDER 35 U.S.C. §102(b)

Claim 16 was rejected under §102(b) as being anticipated by Jeong. Withdrawal of this rejection is requested for at least the following reasons.

i. Jeong does not teach "uppermost layers comprising bond pads", as recited in amended claim 16.

First of all, it is important to note that Jeong does not teach forming vias over bond pads. Rather, Jeong merely teaches forming holes 37 over a first plug 51 and a substrate 21, neither of which is called out as "bond pad."

As one of ordinary skill will appreciate, bond pads are typically an area on the chip or the substrate to which external electrical connections can be bonded. Neither the first plug 51 nor the substrate 21 constitutes a bond pad. Therefore, Jeong does not anticipate claim 16.

ii. Even if Jeong did teach bond pads, Jeong does not teach "multiple vias ... formed over individual bond pads", as recited in claim 16.

As amended, claim 16 clarifies that multiple vias are formed over individual bond pads. Because Jeong's figures and description illustrate and describe only a single via 37 in the insulating layer 27, Jeong does not show multiple vias formed over individual bond pads as recited in claim 16.

III. REJECTION OF REMAINING CLAIMS

Claims 2, 3, 7 and 19-23 were rejected under §102(b) as being anticipated by Jeong. As these claims depend from claims 1 and 16, which are now believed to be allowable, withdrawal of these rejections is respectfully requested.

Claim 17 was rejected under §103(a) as being unpatentable over Jeong in view of U.S. Pat. No. 5,969,422 (Ting et al.). As claim 17 depends from claim 16, which is now believed to be allowable, withdrawal of this rejection is respectfully requested.

IV. <u>NEW CLAIMS 33- 36</u>

New claims 33-36 present additional aspects of the present invention and are believed to be allowable in view of the prior art of record. Accordingly, allowance of the same is requested.

V. CONCLUSION

For at least the above reasons, pending claims currently under consideration are believed to be in condition for allowance and notice thereof is requested.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

In addition, should any fees be due as a result of the filing of this response, the Commissioner is hereby authorized to charge the Deposit Account Number 20-0668, TI-36853US.

Respectfully submitted,

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Ву

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CERTIFICATE OF MAILING (37 CFR 1.8a)

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service on the date shown below with sufficient postage as first class mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: January 5, 2007

Christine Gillroy